

# Exhibit S

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

BODIES OUTSIDE OF UNJUST LAWS:	)	
COALITION FOR REPRODUCTIVE	)	
JUSTICE & LGBTQ+ LIBERATION,	)	
ANDREW THAYER, KRISTI	)	
KEORKUNIAN, and LINDA LOEW,	)	No. 24-cv-3563
	)	
Plaintiffs,	)	Hon. Thomas M. Durkin
	)	
v.	)	
	)	
CITY OF CHICAGO, TOM CARNEY in	)	
his official capacity as Commissioner of the	)	
Chicago Department of Transportation, and	)	
LARRY SNELLING, in his official	)	
capacity as Superintendent of the Chicago	)	
Police Department,	)	
	)	
Defendants.	)	

**DECLARATION OF KRISTI KEORKUNIAN**

I, Kristi Keorkunian, hereby declare as follows:

1. My name is Kristi Keorkunian. I am a resident of Chicago, Illinois and a plaintiff in this action.
2. I make this Declaration based on personal knowledge, and I am competent to testify regarding the following facts.
3. I regularly organize and participate in protests, marches, and assemblies.
4. In addition to Bodies Outside of Unjust Law's march scheduled for August 18, 2024, I intend to participate in one or more marches or demonstrations against the Democratic National Convention (DNC) from August 19 to August 21, 2024, in the vicinity of the United Center.

5. When I participate in protests, I typically bring certain items with me. I intend to bring some of those items to any protests I attend near the United Center during the DNC, including the following:

- a. A store-bought first-aid kit, which typically includes band-aids, an anti-inflammatory such as Ibuprofen, a topical antibiotic such as Neosporin, a sealed package of gauze, a roll of medical tape, a small scissors (typically about 3 inches long, with a rounded tip), lidocaine spray, and a splint,
- b. Towels,
- c. Sign-making materials, including tagboard, markers, a staple gun and staples, and paint sticks from a hardware store (typically about an inch wide and a foot long),
- d. A pint of milk (to relieve eye irritation caused by pepper spray),
- e. For the use of others or for myself (I have diabetes) if needed, a blood sugar monitoring kit, including lancets, a lancing device, a vial containing test strips, and a glucometer,
- f. Narcan, a nasal spray that can counteract the effects of an opioid overdose,
- g. Sunscreen,
- h. House keys,
- i. Phone,
- j. Portable phone charger,
- k. Faraday bag (signal blocking), and
- l. Protest buttons.

6. I may also bring other items, depending on the weather, how I am feeling, or other activities I have planned for the day.

7. I do not know which, if any, of the items I bring might be prohibited by Chicago Ordinance 2024-0008373 (the “Footprint Ordinance”).

8. For example, I do not know if the bar on “pointed objects” includes protest buttons that attach with a pin in the back, the scissors in a first-aid kit, or a lancet in a glucose monitoring kit.

9. Likewise, I do not know if the prohibition on “sealed packages” includes sealed packets of gauze or other medically sealed items in a first-aid kit or glucose monitoring kit.

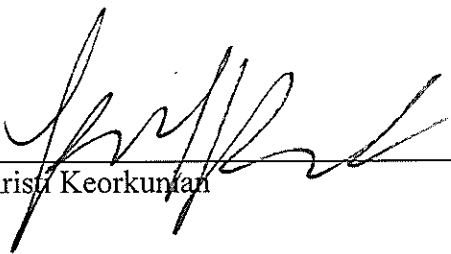
10. Moreover, I do not know what items may later be “[d]etermined by the Chicago Superintendent of Police, in consultation with the United States Secret Service and the Chicago Office of Emergency Management and Communications, to be [p]otential [s]afety [h]azards.”

11. For example, I do not know if the chemicals in Narcan or other medical products might later be declared hazardous.

12. Because the Footprint Ordinance is unclear, I do not know how to ensure that I comply with it when I engage in protests against the DNC near the United Center.

I declare under penalty of perjury that the foregoing is true and correct.

July 12, 2024

  
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Kristi Keorkunian